

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: ) BANKRUPTCY CASE NO.: 09-15390-ELF  
Eric W. Vogt, )  
Debtor. ) CHAPTER 13  
 ) RELATED TO DOCKET NO. 14  
\_\_\_\_\_  
Chase Home Finance, LLC, )  
Objecting Party, )  
vs. )  
Eric W. Vogt, Debtor, and William Miller, )  
Trustee, )  
Respondents. )

**OBJECTIONS BY CHASE HOME FINANCE, LLC TO  
CONFIRMATION OF CHAPTER 13 PLAN**

Chase Home Finance, LLC, (hereinafter “Chase”), by and through its attorneys, Grenen & Birsic, P.C., respectfully represents as follows:

1. This case was filed on or about July 23, 2009. No confirmation hearing has been scheduled as of this writing.
2. Chase is a party-in-interest in this case, by reason of a mortgage that it holds on the Debtor’s personal residence located at 711 Lincoln Avenue, Willow Grove, PA 19090
3. Chase will be filing a claim, listing total arrears as of the date of the bankruptcy filing in the amount of \$1,158.86.
4. The Debtor has filed a plan dated August 25, 2009.

5. The Debtor's plan is completely silent on the treatment of the arrears due to Chase.
6. The plan is, therefore, under-funded and Chase does not consent to this treatment. Chase is entitled to receive the full amount of its arrears as a condition to the cure and reinstatement of the mortgage.
7. Based on the foregoing, Chase does not consent to confirmation of the Debtor's plan.

**WHEREFORE**, Chase respectfully requests that this Court deny confirmation of the proposed plan.

Respectfully submitted,

GRENEN & BIRSIC, P.C.

By: /s/ Jodi L. Hause  
Jodi L. Hause, Esquire  
PA ID No. 90625  
Attorney for Chase Home Finance, LLC  
One Gateway Center, 9<sup>th</sup> Floor  
Pittsburgh, PA 15222  
412-281-7650